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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ALEXANDRIA DEVORE, an individual,

Plaintiff

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a municipal corporation;  
SHERIFF JOSEPH LOMBARDO, an  
individual; LIEUTENANT KURT  
MCKENZIE, an individual, SONNY  
URANICH, an individual, PATRICK  
WESLOWSKI, an individual, UNKNOWN  
OFFICERS 3-12, individuals,

Defendants

Case Number:  
22-cv-01045-CDS-BNW

**STIPULATION AND ORDER TO STAY**  
**CASE FOR SETTLEMENT**  
**NEGOTIATIONS**

**(SECOND REQUEST)**

[ECF No. 59]

The Parties, Plaintiff Alexandria Devore (“Plaintiff”), by and through their counsel of record, Margaret A. McLetchie, Esq., Leo S. Wolpert, Esq., and N. Pieter M. O’Leary, Esq. of McLetchie Law, and Defendant, the Las Vegas Metropolitan Police Department (the “Department” or “LVMPD”), by and through their counsel of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., of Marquis Aurbach, and hereby agree and jointly stipulate the following:

**WHEREAS:**

1. On July 1, 2022, Plaintiff filed her Complaint (ECF No. 1).
2. On April 11, 2023, Plaintiff filed her First Amended Complaint (ECF No. 29).

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1           3.       In accordance with Rule 26 of the Federal Rules of Civil Procedure, with  
2 Rule 26-1 of the Local Rules of the United States District Court for the District of Nevada,  
3 the Parties met and conferred via telephone on July 29, 2022 and September 15, 2022, and  
4 submitted their Amended Stipulated Discovery Plan and Scheduling Order for the court's  
5 approval on September 23, 2022 (ECF No. 18).

6           4.       On April 25, 2023, Defendants filed their Motion for Partial Dismissal (ECF  
7 No. 34).

8           5.       On May 18, 2023, the Court granted Defendants' Motion for Partial  
9 Dismissal (ECF No. 37).

10          6.       On May 23, 2023, Plaintiff filed her Motion for Relief for Order Granting  
11 Defendants' Motion for Partial Dismissal (ECF No. 38).

12          7.       On May 23, 2023, Plaintiff filed her Motion for Leave to File a Second  
13 Amended Complaint (ECF No. 39).

14          8.       On June 1, 2023, Defendants filed their Answer to Plaintiff's First Amended  
15 Complaint (ECF No. 40).

16          9.       On June 8, 2023, the Court granted the Parties' Stipulation and Order to  
17 Extend Discovery Deadlines (ECF No. 44), extending, among other dates, the Discovery  
18 Cut-Off date to December 5, 2023, and the deadline for the Joint Pretrial Order to February  
19 2, 2024.

20          10.       On August 21, 2023, the Court granted the Parties' Stipulation and Order for  
21 60-Day Extension of Stay for Settlement Negotiations (ECF No. 57), staying the case until  
22 October 20, 2023.

23          11.       On August 22, 2023, the court ordered Plaintiff's Motion for Relief for Order  
24 Granting Defendants' Motion for Partial Dismissal (ECF No. 38) and Plaintiff's Motion for  
25 Leave to File a Second Amended Complaint (ECF No. 39) are denied without prejudice  
26 (ECF No. 58).

27          12.       As such, the Parties met and conferred in good faith and have agreed to  
28 extend the stay on all discovery and pre-trial deadlines in this matter for an additional sixty

(60) days to effectuate settlement negotiations in good faith in an effort to resolve Plaintiff's claims in order to limit attorneys' fees, court resources and to further the likelihood of potential resolution.

**STIPULATION**

13. Accordingly, based on the Parties' good faith desire to attempt to resolve the matter via settlement, the Parties hereby stipulate to stay all current discovery and pre-trial deadlines as set forth in the Stipulation and Order to Extend Deadlines (ECF No. 44) for an additional period of sixty (60) days.

14. The stay period will commence the day following the entry of this Court's order.

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IT IS SO STIPULATED.

MARQUIS AURBACH

By: /s/ Jackie V. Nichols  
Craig R. Anderson, Esq.  
Nevada Bar No. 6882  
Jackie V. Nichols, Esq.  
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Attorneys for Defendant Las Vegas  
Metropolitan Police Department

IT IS FURTHER ORDERED that the parties must file either (1) a stipulation and order to extend deadlines as outlined above, or (2) a joint status report addressing the status of settlement, on or before January 31, 2024.

DATED: November 8, 2023